



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

REDACTED VERSION

GENERAL NOTICE LETTER

URGENT LEGAL MATTER, PROMPT REPLY NECESSARY

CERTIFIED MAIL: RETURN RECEIPT REQUESTED #7008 0150 0003 6265 4496

The B.F. Goodrich Company
Goodrich Corporation
4 Coliseum Centre
2730 West Tyvola Road
Charlotte, North Carolina 28217

Re: General Notice Letter for the Goodrich Asbestos Site in Miami, Ottawa County, Oklahoma

Dear Sir/Madam,

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) is responsible for responding to the release or threat of release of hazardous substances, pollutants or contaminants into the environment – that is, for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. The EPA has documented that such a release has occurred at the Goodrich Asbestos Site (Site) located in Miami, Ottawa County, Oklahoma. The EPA has spent public funds to investigate and control releases of hazardous substances or potential releases of hazardous substances at the Site. Based on information presently available to the EPA, the EPA has determined that The B.F. Goodrich Company may be responsible under CERCLA for costs the EPA has incurred in cleaning up the Site.

Site Background

The former B.F. Goodrich plant operated a tire manufacturing facility at 1000 Goodrich Boulevard, Miami, Oklahoma from 1944 until approximately 1986. The former manufacturing facility occupied approximately 164 acres. Multiple structures and other areas on the Goodrich Asbestos Site were found to contain known asbestos contamination. Levels of asbestos, including friable asbestos, were found in demolition debris piles, and several abandoned structures on the Site, including the Powerhouse Building, oven building and brick office building. Asbestos contamination was also present in soils, autoclave basements, utility pits and in miscellaneous wastes at the Site. The assessment of the Site showed levels of asbestos, ranging from trace to 80% and in friable and non-friable form.

The EPA, in consultation with the Oklahoma Department of Environmental Quality, determined that trespassers were repeatedly breaking the fencing surrounding the Site, then breaking into several of the abandoned structures on the Site. The area surrounding the Site includes three schools located on the eastern perimeter of the Site as well as hundreds of homes surrounding the plant.

In May 2019, the Region 6 Superfund and Emergency Management Division provided verbal approval for an Emergency Removal Action at the Site. The EPA commenced removal activities in June 2019. In January 2020, the EPA completed the cleanup of the Site. The removal action involved the removal of more than 24,000 tons of asbestos-containing materials and other hazardous substances.

Explanation of Potential Liability

Under CERCLA specifically Sections 106(a) and 107(a), Potentially Responsible Parties (PRPs) may be required to perform cleanup actions to protect public health, welfare, or the environment. PRPs may also be responsible for costs incurred by the EPA in cleaning up the Site, unless the PRP can show divisibility or any of the other statutory defenses. PRPs include current and former owners and operators of a site as well as persons who arranged for treatment and/or disposal of any hazardous substance found at a site, and persons who accepted hazardous substances for transport and selected a site to which hazardous substances were delivered.

The former B.F. Goodrich plant operated a tire manufacturing facility at the location of the Site on 1000 Goodrich Boulevard, Miami, Oklahoma from 1944 until approximately 1986. Based on the information collected, the EPA believes that B.F. Goodrich may be liable under Section 107(a) of CERCLA with respect to the Goodrich Asbestos Site, as a current or previous owner and/or operator of the Site.

The EPA's response costs at the Site may include, but are not limited to, expenditures for conducting a Removal Action, and other investigation, planning, response oversight, and enforcement activities. In addition, PRPs may be required to pay for damages for injury to, destruction of or loss of natural resources, including the cost of assessing such damages.

Financial Concerns/Ability to Pay Settlements

The EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a site may be substantially limited. If you believe, and can document, that you fall within that category, please complete the information on the enclosed "Financial Statement for Businesses" form (Enclosure 2) and mail within 14 calendar days of receipt of this letter to:

Anna Copeland, Enforcement Officer
Superfund Enforcement and Cost Recovery Section (SEDAE)
United States Environmental Protection Agency, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

Also, please note that, because the EPA has a potential claim against you, you must include the EPA as a creditor if you file for bankruptcy. The EPA reserves the right to file a proof of claim or an application for reimbursement of administrative expenses.

If the EPA concludes that you have a legitimate inability to pay the full amount of the EPA's costs, the EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Resources and Information for Small Businesses

As you may be aware, on January 11, 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law via the Internet at:

<http://www.gpo.gov/fdsys/pkg/PLAW-107publ118/pdf/PLAW-107publ118.pdf>

and review the EPA guidances regarding these exemptions at:

<https://www.epa.gov/brownfields/summary-small-business-liability-relief-and-brownfields-revitalization-act>

The EPA has created a number of helpful resources for small businesses. The EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers, which offer various forms of resources to small businesses. You may inquire about these resources at:

<https://www.epa.gov/compliance/compliance-assistance-centers>

In addition, the EPA Small Business Ombudsman may be contacted at:

<https://www.epa.gov/resources-small-businesses/asbestos-small-business-ombudsman>

Finally, the EPA developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act (SBREFA), which is enclosed with this letter and available on the Agency's website at:

<http://www.epa.gov/compliance/small-business-resources-information-sheet>

Please give these matters your immediate attention and consider consulting with an attorney. If you or your attorney have any legal questions, please contact Gloria Moran, Assistant Regional Counsel at (214) 665-3193. If you have any other questions regarding this letter, please contact Anna Copeland, Enforcement Officer at 214-665-8144. Thank you for your prompt attention to this matter.

Sincerely yours,

Susan D. Webster, Chief
Assessment & Enforcement Branch
Superfund Division

Enclosures:

1. Evidence of Liability
2. Financial Statement for Businesses
3. Small Business Resources Fact Sheet
4. Parties Receiving General Notice Letter

ENCLOSURE 1

**GOODRICH ASBESTOS SITE
GENERAL NOTICE LETTER**

EVIDENCE OF LIABILITY

#2862

Form No. 3

BOOK 355 PAGE 780 QUIT CLAIM DEED

THIS INDENTURE, made and entered into this 12th day of August, 1975,
 by and between Joseph E. Mountford and Norma Mountford, husband and wife,
 The B. F. Goodrich Company, a corporation, parties of the first part, and
 party of the second part;
 WITNESSETH, That the said parties of the first part, for and in consideration of the sum of One Dollar
 and other good and valuable considerations, ~~XXXXXX~~
 to them duly paid, the receipt whereof is hereby acknowledged, do hereby quit claim, grant, bargain, sell
 and convey unto the said party of the second part, and to its successors ~~XXXXXX~~ and assigns,
 forever, all their right, title, interest and estate, both at law and in equity, of, in and to all of the following
 described real estate situated in the County of Ottawa, and State of Oklahoma, to-wit;

The NE 1/4 of the SW 1/4, Section 24, T 28 N, R 22 E.

DocNumber:

Book & Page:
355 780

Filed:

08-28-1975

00:00:00 AM

Dated:

(The total consideration herein is less than \$100.00, and no documentary
 stamps are required under the law.)

TO HAVE AND TO HOLD THE SAME, Together with all and singular the hereditaments and appurtenances thereunto
 belonging, or in anywise appertaining unto the said party of the second part, its successors ~~XXXXXX~~
 and assigns, so that neither the said parties of the first part nor any person in their name or be-
 half, shall or will hereafter claim or demand any right or title to the said premises or any part thereof; but they, and every
 one of them, shall by these presents be excluded and forever barred.

IN WITNESS WHEREOF, The said parties of the first part have hereunto set their hands
 and seals the day and year first above written.

Joseph E. Mountford (Seal)
Norma Mountford (Seal)
 (Seal)
 (Seal)

ACKNOWLEDGMENT

STATE OF OKLAHOMA,
 County of Ottawa.

Before me the undersigned

, a Notary Public in and for said County and State on this

12th day of August, 1975, personally appeared

Joseph E. Mountford and Norma Mountford, husband and wife,
 to me know to be the identical persons who executed the within and foregoing
 instrument and acknowledged to me that they executed the same as their
 free and voluntary act and deed for the uses and purposes therein set forth.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official
 seal the day and year last above written.

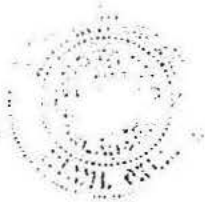
My commission expires

October 31,

1976.

Katherine Spier
 Notary Public.

\$ 200



2302 S. Barnett
Dulles, OK. 74129

4280

BOOK 556 PAGE 695

QUIT-CLAIM DEED

THIS INDENTURE, made this 16th day of September, 1993, between The B.F. Goodrich Company, a corporation under the laws of the State of New York, party of the first part, and Save Our Children's Environment, a corporation under the laws of the State of Oklahoma, party of the second part.

WITNESSETH, that said party of the first part, in consideration of the sum of ONE & NO/100THS (\$1.00) DOLLARS to it duly paid, the receipt whereof is hereby acknowledged, does hereby quit-claim, grant, bargain, sell and convey unto the said party of the second part, and to it's successors and assigns forever, all it's right, title interest and estate, both at law and in equity, of, in and to, the following described real estate, situated in the County of OTTAWA, State of Oklahoma, to-wit:

The South Half of the Northwest Quarter and the North Half of the Southwest Quarter of Section Twenty-four, Township Twenty-eight North, Range Twenty-two East of the Indian Meridian.

(THE CONSIDERATION FOR THIS DEED IS LESS THAN \$100.00)

Together with all and singular the hereditaments and appurtenances thereunto belonging. TO HAVE AND TO HOLD the above granted premises unto the said party of the second part it's successors and assigns forever.

IN WITNESS WHEREOF, The Vice President of The B.F. Goodrich Company has caused this Quit-Claim Deed to be executed in it's name on it's behalf and the seal of said Corporation to be hereunto affixed and attested by it's Assistant Secretary, all as of the day and year first above written.

THE B.F. GOODRICH COMPANY

By R. A. McMillan KOB
R. A. McMillan, Vice President
RECORDED IN THE OFFICE OF
COUNTY CLERK
OTTAWA COUNTY, OKLAHOMA

ATTEST:

R. N. Jacobson
R. N. Jacobson, Assistant Secretary

SEP 16 11 03 AM '93

STATE OF OHIO

COUNTY OF PORTAGE ss.

Deputy
BY DEPUTY

The above and foregoing instrument was subscribed and sworn to before me on the 16th day of SEPTEMBER, 1993, by R. A. McMillan, Vice President of The B.F. Goodrich Company, a corporation under the laws of the State of New York, for and on behalf of said corporation.

Given under my hand and seal of office the day and year above written.

Joanne Prosser
NOTARY PUBLIC

My Commission Expires:

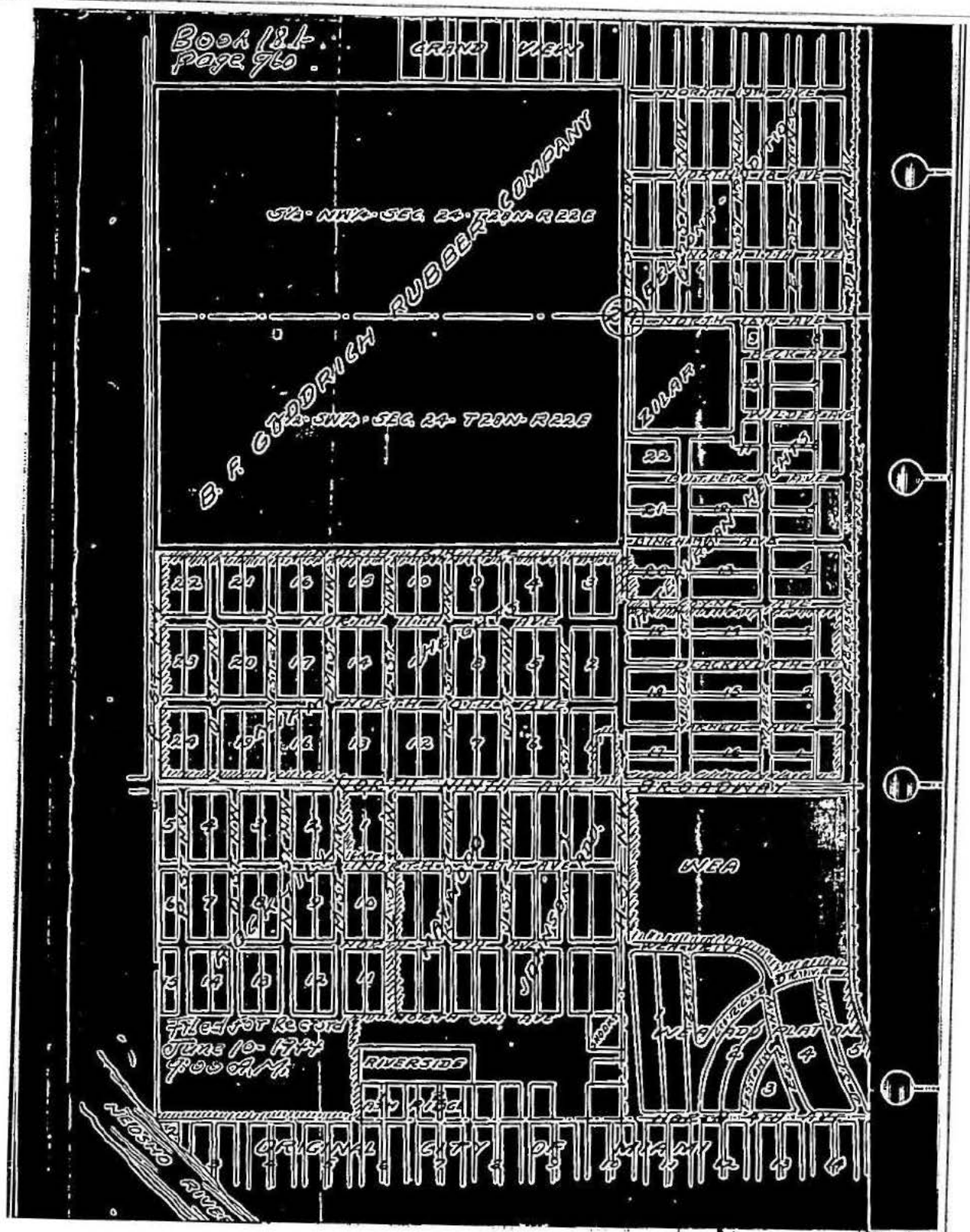
Joanne Prosser
Notary Public for State of Ohio
My commission expires June 20, 1998

8.5

DocNumber:

Book & Page:
181 959

Filed:
06-10-1944
00:00:00 AM
Dated:



ENCLOSURE 2

**GOODRICH ASBESTOS SITE
GENERAL NOTICE LETTER**

FINANCIAL STATEMENT FOR BUSINESSES



U.S. Environmental Protection Agency, Region IX
Financial Statement for Businesses *

(If additional space is needed, attach a separate sheet)

1. Your name and address (including zipcode and county)	1a. Business name and address (including zipcode and county)	2. Business phone number	()
		4. (Check appropriate box)	
3. Name and address of registered agent (including zipcode and county)		<input type="checkbox"/> Sole proprietor	<input type="checkbox"/> Trust
		<input type="checkbox"/> Partnership	<input type="checkbox"/> Other (specify) _____
		<input type="checkbox"/> Corporation	_____
5. State of Incorporation (or country if foreign)	5a. Employer Identification Number	6. Date of Incorporation	7a. Type of business
			7b. SIC Code

8. Information about owner, partners, officers, directors, major shareholder (5% or more stock ownership), other holders of more than 5% equity interest, holders of rights to purchase more than equity interest and other persons with an ability to control.

Name and Title	Effective Date	Home Address	Social Security Number (optional)	Phone Number	Total Shares or Interest

Section I General Financial Information

9. Last three years Federal and state income tax returns	Forms Filed	Tax Years ended	Net income before taxes
--	-------------	-----------------	-------------------------

10. Bank accounts (List all types of accounts including checking, savings, certificates of deposit, etc.)

Name of Institution	Address	Type of Account	Account No.	Balance
Total (Enter in Item 19)				

11. Bank Credit available (Lines of credit, etc.)

Name of Institution	Address	Credit Limit	Amount Owed	Credit Available	Monthly
Totals					

12. Location, box number, and contents of all safe deposit boxes rented or accessed

Section I - continued

General Financial Information

13. Real property

Brief Description and Type of Ownership	Address (include county, state and parcel number)
a.	
b.	
c.	

14. Insurance policies owned with business as beneficiary

Name Insured	Company	Policy Number	Type	Face Amount	Available Loan Value
Total (Enter in Item 21)					

15. Additional Information (Court and administrative proceedings by or against the business, settlement agreements, agreements to purchase or sell tangible or financial assets other than in the ordinary course of business, legal claims (whether asserted or not), bankruptcies, repossessions, recent transfers of assets for less than full value, anticipated increases in income, options to buy or sell real or personal property, real or personal property being purchased under contract, real or personal property being held on behalf of the business).

15a. List all subsidiaries owned, joint ventures, partnerships and other entities controlled by the business. Provide current market value of the business' interest in such subsidiary or other entity.

16. Federal government departments or agencies with whom you have a contract for payment of goods or services

Agency Name	Address	Contract No.	Amount to be Received	Payment Due Date

16a. Federal government departments or agencies that have extended or given the business loans, grants or assistance, or to which you have applied (or anticipate applying for any loan, grant, or assistance) in the past 5 years.

17. Accounts/Notes receivable (include loans to stockholders, officers, partners, etc.)

Agency Name	Address	Amount Due	Due Date	Status
Total (Enter in Item 20)				

Section II.

Asset and Liability Analysis

Description (a)	Cur. Mkt Value (b)	Liabilities Bal. Due (c)	Equity in Asset (d)	Amount of Mo. Pymt. (e)	Name and Address of Lien/Note Holder/Obligee (f)	Date Pledged (g)	Date of Final Pymt. (h)
18. Cash on hand							
19. Bank accounts							
19a. Securities and other financial assets owned							
20. Accounts/Notes receivable							
21. Insurance Loan Value							
22. Real property (from item 13)	a.						
	b.						
	c.						
	d.						
23. Vehicles (Model, year, license)	a.						
	b.						
	c.						
24. Machinery and equipment (Specify)	a.						
	b.						
	c.						
25. Merchandise inventory (Specify)	a.						
	b.						
26. Other Assets (including permits, licenses, tax loss carry forwards, agreements not to compete, other contracts) (Specify)	a.						
	b.						
	c.						
	d.						
27. Other Liabilities (Include judgements, notes, tax liens, etc.)	a.						
	b.						
	c.						
	d.						
	e.						
28. Federal & State Taxes Owed							
29. Totals							

Section III.

Income and Expense Analysis

The following information applies to income and expenses during a one year period:

Accounting method used

to

Income

Expenses

30. Gross receipts from sales, services, etc.

\$

36. Materials purchased

\$

31. Gross rental income

37. Wages and salaries of employees

32. Interest

38. Wages/salaries/bonuses for officers, directors and stockholders

33. Dividends

39. Rent

34. Other income (Specify)

40. Installment payments (from line 29)

41. Supplies

42. Utilities / Telephone

43. Gasoline / Oil

44. Repairs and maintenance

45. Insurance

46. Current taxes

47. Other, including fees paid for services (Specify)

35. Total



\$

48. Total



\$

49. Net difference



\$

50. List all transferred real & personal property, including cash (by gift; by loan that was not at fair market terms; by sale for less than fair market value or made outside the normal course of business, etc.) that was made within the last 3 years (items of \$3,000.00 or more):

Date	Amount	Property Transferred	To Whom	Conditions of Transfer
			(Indicate any relationship to business or its partners, directors, stockholders, or other controlling persons)	

Certification

Under penalties of perjury, I declare that to the best of my knowledge and belief this statement of assets, liabilities, and other information is true, correct, and complete.

51. Signature

52. Print Name / Title

53. Date

ENCLOSURE 3

**GOODRICH ASBESTOS SITE
GENERAL NOTICE LETTER**

SMALL BUSINESS RESOURCES FACT SHEET

U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

Office of Small and Disadvantaged Business Utilization (OSDBU)

<https://www.epa.gov/aboutepa/about-office-small-and-disadvantaged-business-utilization-osdbu>

EPA's OSDBU advocates and advances business, regulatory, and environmental compliance concerns of small and socio-economically disadvantaged businesses.

EPA's Asbestos Small Business Ombudsman (ASBO)

<https://www.epa.gov/resources-small-businesses/asbestos-small-business-ombudsman> or 1-800-368-5888

The EPA ASBO serves as a conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency.

Small Business Environmental Assistance Program

<https://nationalsbeap.org>

This program provides a "one-stop shop" for small businesses and assistance providers seeking information on a wide range of environmental topics and state-specific environmental compliance assistance resources.

EPA's Compliance Assistance Homepage

<https://www.epa.gov/compliance>

This page is a gateway to industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

Compliance Assistance Centers

<https://www.complianceassistance.net>

EPA-sponsored Compliance Assistance Centers provide the information you need, in a way that helps make sense of environmental regulations. Each Center addresses real world issues faced by a specific industry or government sector. They were developed in partnership with industry, universities and other federal and state agencies.

Agriculture

<https://www.epa.gov/agriculture>

Automotive Recycling

<http://www.eeacenter.org>

Automotive Service and Repair

<https://ecar-greenlink.org/> or 1-888-GRN-LINK

Combustion—Boilers, Generators, Incinerators, Wood Heaters

<https://www.combustionportal.org/>

Construction

<http://www.cicacenter.org>

Education

<https://www.nacubo.org/>

Healthcare

<http://www.hercenter.org>

Local Government

<https://www.lgean.net/>

Oil/ Natural Gas Energy Extraction

<https://www.eeiee.org/>

Paints and Coatings

<https://www.paintcenter.org/>

Ports

<https://www.portcompliance.org/>

Surface Finishing

<http://www.stere.org/>

Transportation

<https://www.terecenter.org/>

U.S. Border Compliance and Import/Export Issues

<https://www.bordercenter.org>

Veterinary Care

<https://www.vetca.org/>

EPA Hotlines and Clearinghouses

www.epa.gov/home/epa-hotlines

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Examples include:

Clean Air Technology Center (CATC) Info-line

www.epa.gov/cate or 1-919-541-0800

Superfund, TRI, EPCRA, RMP, and Oil Information Center

1-800-424-9346

EPA Imported Vehicles and Engines Public Helpline

www.epa.gov/otaq/imports or 1-734-214-4100

National Pesticide Information Center

www.npic.orst.edu or 1-800-858-7378

National Response Center Hotline to report oil and hazardous substance spills - <http://nrc.uscg.mil> or 1-800-424-8802

Pollution Prevention Information Clearinghouse (PPIC) -

www.epa.gov/p2/pollution-prevention-resources/ppic or 1-202-566-0799

Safe Drinking Water Hotline -

www.epa.gov/ground-water-and-drinking-water/safe-drinking-water-hotline or 1-800-426-4791

Toxic Substances Control Act (TSCA) Hotline

tsc hotline@epa.gov or 1-202-554-1404

U.S. Small Business Resources

Small Entity Compliance Guides

<https://www.epa.gov/reg-flex/small-entity-compliance-guides>

EPA publishes a Small Entity Compliance Guide (SECG) for every rule for which the Agency has prepared a final regulatory flexibility analysis, in accordance with Section 604 of the Regulatory Flexibility Act (RFA).

Regional Small Business Liaisons

www.epa.gov/resources-small-businesses/epa-regional-office-small-business-liaisons

The U.S. Environmental Protection Agency (EPA) Regional Small Business Liaison (RSBL) is the primary regional contact and often the expert on small business assistance, advocacy, and outreach. The RSBL is the regional voice for the EPA Asbestos and Small Business Ombudsman (ASBO).

State Resource Locators

www.envcap.org/statetools

The Locators provide state-specific information on regulations and resources covering the major environmental laws.

State Small Business Environmental Assistance Programs (SBEAPs)

<https://nationalsbeap.org/states/list>

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits.

EPA's Tribal Portal

<https://www.epa.gov/tribal>

The Portal helps users locate tribal-related information within EPA and other federal agencies.

EPA Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has several such policies that may apply to small businesses. More information is available at:

- **EPA's Small Business Compliance Policy**
<https://www.epa.gov/compliance/small-business-compliance>
- **EPA's Audit Policy**
www.epa.gov/compliance/epas-audit-policy

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a Small Business Administration (SBA) National Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the SBA's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, you can call the SBA National Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247), or submit a comment online at <https://www.sba.gov/about-sba/oversight-advocacy/office-national-ombudsman>.

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.

ENCLOSURE 4

**GOODRICH ASBESTOS SITE
GENERAL NOTICE LETTER**

PARTIES RECEIVING GENERAL NOTICE LETTER

Real Estate Remediation LLC
3519 Greensboro Avenue
Tuscaloosa, Alabama 35401

Allan Kaspar

(b) (6)

A large black rectangular redaction box covers the contact information for Allan Kaspar, with the text "(b) (6)" written in red at the top left of the box.

The B.F. Goodrich Company
Goodrich Corporation
4 Coliseum Centre
2730 West Tyvola Road
Charlotte, North Carolina 28217

Michelin North America, Inc.
One Parkway South
P.O. Box 19001
Greenville, South Carolina 29602



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

GENERAL NOTICE LETTER

URGENT LEGAL MATTER, PROMPT REPLY NECESSARY

CERTIFIED MAIL: RETURN RECEIPT REQUESTED #7008 0150 0003 6265 4496

The B.F. Goodrich Company
Goodrich Corporation
4 Coliseum Centre
2730 West Tyvola Road
Charlotte, North Carolina 28217

Re: General Notice Letter for the Goodrich Asbestos Site in Miami, Ottawa County, Oklahoma

Dear Sir/Madam,

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) is responsible for responding to the release or threat of release of hazardous substances, pollutants or contaminants into the environment – that is, for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. The EPA has documented that such a release has occurred at the Goodrich Asbestos Site (Site) located in Miami, Ottawa County, Oklahoma. The EPA has spent public funds to investigate and control releases of hazardous substances or potential releases of hazardous substances at the Site. Based on information presently available to the EPA, the EPA has determined that The B.F. Goodrich Company may be responsible under CERCLA for costs the EPA has incurred in cleaning up the Site.

Site Background

The former B.F. Goodrich plant operated a tire manufacturing facility at 1000 Goodrich Boulevard, Miami, Oklahoma from 1944 until approximately 1986. The former manufacturing facility occupied approximately 164 acres. Multiple structures and other areas on the Goodrich Asbestos Site were found to contain known asbestos contamination. Levels of asbestos, including friable asbestos, were found in demolition debris piles, and several abandoned structures on the Site, including the Powerhouse Building, oven building and brick office building. Asbestos contamination was also present in soils, autoclave basements, utility pits and in miscellaneous wastes at the Site. The assessment of the Site showed levels of asbestos, ranging from trace to 80% and in friable and non-friable form.

The EPA, in consultation with the Oklahoma Department of Environmental Quality, determined that trespassers were repeatedly breaking the fencing surrounding the Site, then breaking into several of the abandoned structures on the Site. The area surrounding the Site includes three schools located on the eastern perimeter of the Site as well as hundreds of homes surrounding the plant.

General Notice Letter – Goodrich Asbestos Site (Goodrich)

Copeland SEDAE	Johnson SEDAE	Moran ORC	Chiang ORC	Webster SED
cc 3/11/20		GM 3/12/20		

Date

03/10/20

ROUTING AND APPROVAL FORM

TO: (Name, office symbol, room number,
building, Agency/Post)

Initials

Date

1. Anna Copeland - SEDAE

adc

3/11/20

2. Lydia Johnson - SEDAE

Johnson, Lydia

Digitally signed by Johnson, Lydia
DN: cn=Johnson, Lydia, email=johnson.lydia@epa.gov
Date: 2020.04.01 08:59:19 -05'00'

sm

3/12/20

3. Shellita Garrett, Log in ORCS

4. Gloria Moran - ORCS

5. I-Jung Chiang - ORCS

6. Shellita Garrett, Log out ORCS

7. Deborah Greenwell, Log in SEDA

8. Susan Webster - SEDA

9. Deborah Greenwell, Log out SEDA

10. Anna Copeland

<input type="checkbox"/> Action	<input type="checkbox"/> File	<input type="checkbox"/> Note and Return
<input checked="" type="checkbox"/> Approval	<input type="checkbox"/> For Clearance	<input type="checkbox"/> Per Conversation
<input type="checkbox"/> As Requested	<input type="checkbox"/> For Correction	<input type="checkbox"/> Prepare Reply
<input checked="" type="checkbox"/> Circulate	<input type="checkbox"/> For Your Information	<input type="checkbox"/> See Me
<input type="checkbox"/> Comment	<input type="checkbox"/> Investigate	<input checked="" type="checkbox"/> Signature
<input type="checkbox"/> Coordination	<input type="checkbox"/> Justify	

REMARKS

General Notice Letter - Goodrich Asbestos Site (B. F. Goodrich Company)

FROM: (Name, org. symbol, Agency/Post)

Anna Copeland

Room No. - Bldg.

SEDAE

Phone No.

(214) 665-8144

ORD OF - 41

(Rev. 5-14) (WebForms v3.7)

Audit Trail for

ORD Routing and Approval Form

PDF Name: ORDOF41.pdf

Form Number: ORD-OF41

Document Identifier: ORD-OF41-15320142151-DC